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FEB - 1 2006

Mr. Robert L. Davis, Colonel U.S. Army, Chief of Staff - FLW U.S. Army MANSCEN and Fort Leonard Wood ATZT-DPW-EE 1334 First Street Ft. Leonard Wood, MO 64573,

Re:

U.S. Army MANSCEN and Fort Leonard Wood, 169-0004

Permit Numbers: OP2006-005 through 2006-010

Dear Colonel Davis:

Enclosed with this letter is your operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program at (573) 751-4817, or you may write to the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.

Permit Section Chief

MJS:mvb

**Enclosures** 

c:

Ms. Tamara Freeman, U.S. EPA Region VII Ms. Amy Baker, Kansas City Regional Office

PAMS File: 169-0004-020A



# PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number: OP2006-009

Expiration Date: 01/31/2011

Installation ID Number: 169-0004

**Project Number:** 169-0004-020F

**Installation Name and Address** 

U.S. Army MANSCEN and Fort Leonard Wood ATZT-DPW-EE 1334 First Street Ft. Leonard Wood, MO 64573 Pulaski County

#### Parent Company's Name and Address

Training & Document Command ATBO-SE Fort Monroe, VA 23651-5000

#### **Installation Description:**

U.S. Army MANSCEN and Fort Leonard Wood is a federal military installation in Pulaski County. The operating permit is divided into six documents. This document includes the dry cleaners and associated units.

FEB - 1 2006

Effective Date

Director or Designee

Department of Natural Resources

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# I. Installation Description and Equipment Listing

#### INSTALLATION DESCRIPTION

U.S. Army MANSCEN and Fort Leonard Wood is a federal military installation in Pulaski County. The installation is an existing major source of particulate matter less than or equal to ten microns ( $PM_{10}$ ), sulfur oxides ( $SO_x$ ), nitrogen oxides ( $NO_x$ ), ozone (VOC) and carbon monoxide ( $NO_x$ ).

The installation's primary purpose is to train enlisted and officer personnel of all branches of service in basic combat training, military engineering, and motor vehicle operations. The installation includes power plants, rock crushing plants, an asphalt plant, storage vessels, a chemical defense training facility, chemical and military police training schools, dry cleaners, and associated equipment.

	Reported Air Pollutant Emissions, tons per year						
Year	Particulate  Matter  ≤ Ten Microns  (PM <sub>10</sub> )	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2000	82.88	5.82	73.36	135.86	470.67		0.66
2001	81.82	11.39	86.61	114.73	721.41		0.09
2002	29.41	3.53	94.46	135.89	168.69		0.09
2003	96.14	25.9	116.88	203.81	670.69		0.02
2004	155.96	29.07	62.74	158.73	1333.7		0.03

#### **EMISSION UNITS WITH LIMITATIONS**

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU8010	Building 2351 Dry-to-Dry Machine No. 1
EU8020	Building 2351 Dry-to-Dry Machine No. 2
EU8030	Building 2351 Boiler No. 1
EU8040	Building 2351 Boiler No. 2
EU8050	Building 2351 Boiler No. 3
EU8060	Building 2351 Boiler No. 4

#### **EMISSION UNITS WITHOUT LIMITATIONS**

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source
None

#### **DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1. Air Pollution Control Program Construction Permit #062003-015
- 2. Air Pollution Control Program Construction Permit #082002-024A
- 3. Air Pollution Control Program Construction Permit #082002-024

- 4. Air Pollution Control Program Construction Permit #022002-009
- 5. Air Pollution Control Program Construction Permit #052001-011
- 6. Air Pollution Control Program Construction Permit #052001-010
- 7. Air Pollution Control Program Construction Permit #052000-004A
- 8. Air Pollution Control Program Construction Permit #0794-011
- 9. Air Pollution Control Program Construction Permit #0392-011

# II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

#### **Permit Condition PW001**

10 CSR 10-6.060

#### **Construction Permits Required**

Air Pollution Control Program Construction Permit #0392-011

Air Pollution Control Program Construction Permit #082002-024

#### Emission Limitation:

If a continuing situation of demonstrated nuisance dust exists where the presence of particulate matter less than ten microns  $(PM_{10})$  in the ambient air exists in quantities and durations that directly or proximately cause or contribute to injury to human, plant, or animal life or health, or to property, or that unreasonably interferes with the enjoyment of life or the use of property, the Director may require USA MANSCEN-FLW to submit a corrective action plan within ten days adequate to timely and significantly mitigate the emission of  $PM_{10}$ . USA MANSCEN-FLW shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of this permit

#### Monitoring/Record Keeping/Reporting:

- 1. The permittee shall monitor the requested information in an approved corrective action plan. Note: No monitoring is required if a corrective action plan is not required.
- 2. The permittee shall keep records of the requested information in an approved corrective action plan. Note: No record keeping is required if a corrective action plan is not required.
- 3. The permittee shall submit a corrective action plan to the Air Pollution Control Program if required by the Director.

# **Permit Condition PW002**

10 CSR 10-6.060

#### **Construction Permits Required**

Air Pollution Control Program Construction Permit #082002-024

#### Equipment and Operation Parameters:

- 1. USA MANSCEN-FLW shall immediately render inoperable all boilers and/or heaters designed to burn #6 residual oil located in USA MANSCEN-FLW 's Building #645 (EP: FLW 002J, 002K, 002L & 002M).
- 2. USA MANSCEN-FLW shall immediately render inoperable all woodworking operations located in USA MANSCEN-FLW's Building 1448 (EP: FLW 016).
- 3. USA MANSCEN-FLW shall immediately render inoperable the hospital waste incinerator (EP: FLW 014) constructed under APCP Permit No. 0590-004.
- 4. The above removed emission sources may not be operated without first obtaining a New Source Review permit from the APCP.

#### **Permit Condition PW003**

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

# Emission Limitation:

- 1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line or origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director; or
- 2. The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3. Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary.

#### Monitoring/Record Keeping:

The permittee shall conduct and record inspections of its facilities sufficient to determine compliance with this regulation, if required by the Director. If a violation of this regulation is discovered, the source shall undertake corrective action to eliminate the violation.

#### Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

# III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

	EU8010 through EU8020						
	Building 2351 Dry-to-Dry Machine						
HOTERIAS COMPANION POR MINISTERNAS SIGNATURAS CONTRACTOR CONTRACTO	Building 2351 Dry-to-Dry Machine	No. 2					
Emission Unit	Description	Manufacturer/Model #	2002 EIQ Reference #				
EU8010	Dry-to-Dry Machine No. 1 with a refrigerated condenser.	Multimatic Model E35	EP12				
EU8020	Dry-to-Dry Machine No. 2 with a refrigerated condenser.	Multimatic Model Shopstar 300	EP12				

# Permit Condition (EU8010 through EU8020)-001

10 CSR 10-6.075

Maximum Achievable Control Technology Regulations

40 CFR 63 Subpart M

National Perchloroethylene Air Emission Standards for Dry Cleaning

#### Emission Limitation:

- 1. The owner or operator shall close the door of each dry cleaning machine immediately after transferring articles to or from the machine, and shall keep the door closed at all other times. (§63.322(c))
- 2. The owner or operator of each dry cleaning system shall operate and maintain the system according to the manufacturers' specifications and recommendations. (§63.322(d))
- 3. The owner or operator shall drain all cartridge filters in their housing, or other sealed container, for a minimum of twenty-four (24) hours, or shall treat such filters in an equivalent manner, before removal from the dry cleaning facility. (§63.322(i))
- 4. The owner or operator shall store all perchloroethylene and wastes that contain perchloroethylene in solvent tanks or solvent containers with no perceptible leaks. (§63.322(j))
- 5. The owner or operator shall inspect the following components of the dry cleaning system weekly for perceptible leaks while the dry cleaning system is operating: (§63.322(k))
  - a) Hose and pipe connections, fittings, couplings and valves; (§63.322(k)(1))
  - b) Door gaskets and seatings; (§63.322(k)(2))
  - c) Filter gaskets and seatings; (§63.322(k)(3))
  - d) Pumps; (§63.322(k)(4))
  - e) Solvent tanks and containers; (§63.322(k)(5))
  - f) Water separators; (§63.322(k)(6))
  - g) Muck cookers; (§63.322(k)(7))
  - h) Stills; (§63.322(k)(8))
  - i) Exhaust dampers; (§63.322(k)(9))
  - j) Diverter valves; (§63.322(k)(10))
  - k) Cartridge filter housings; (§63.322(k)(11))
- 6. The owner or operator shall repair all perceptible leaks detected under paragraph 63.322(k) within twenty-four (24) hours. If repair parts must be ordered, either a written or verbal order for those parts shall be initiated within two (2) working days of detecting such a leak. Such repair parts shall be installed within five (5) working days after receipt. (§63.322(m))

- 7. The owner shall comply with paragraph (a)(1) of §63.322(a). Route the air-perchloroethylene gas-vapor stream contained within each dry cleaning machine through a refrigerated condenser or an equivalent control device. (§63.322(a)(1)).
- 8. Each refrigerated condenser used for the purpose of comply with §63.322(a) or (b) and installed on a dry-to-dry machine: (§63.322(e))
  - a) Shall be operated to not vent or release the air-perchloroethylene gas-vapor stream contained within the dry cleaning machine to the atmosphere while the dry cleaning machine drum is rotating; (§63.322(e)(1))
  - b) Shall be monitored according to §63.323(a)(1); (§63.322(e)(2)) and
  - c) Shall be operated with a diverter valve, which prevents air drawn into the dry cleaning machine when the door of the machine is open form passing through the refrigerated condenser. (§63.322(e)(3))
- 9. If the parameter values monitored under §63.322 (e) do not meet the values specified in §63.323(a), adjustments or repairs shall be made to the dry cleaning system or control device to meet those values. If repair parts must be ordered, either a written or verbal order for such parts shall be initiated within two (2) working days of detecting such a parameter value. Such repair parts shall be installed within five (5) working days after receipt. (§63.322(n))

#### Monitoring:

- 1. When calculating yearly perchloroethylene consumption for the purpose of demonstration applicability according to §63.320, the owner or operator shall perform the following calculation on the first day of every month; (§63.323(d))
  - a) Sum the volume of all perchloroethylene purchases made in each of the previous twelve (12) months as recorded in the log described in §63.324(d)(1). (§63.324(d)(1)). (Attachment L, or an equivalent record keeping sheet shall be used to record all information required by this rule)
  - b) If no perchloroethylene purchases were made in a given month, then the perchloroethylene consumption for that month is zero (0) gallons. (§63.324(d)(2)).
  - c) The total sum calculated in paragraph (d) of this section is the yearly perchloroethylene consumption at the facility. (§63.324(d)(3))
- 2. When a refrigerated condenser is used to comply with §63.322(a)(1), the owner or operator shall measure the temperature of the air-perchloroethylene gas-vapor stream on the outlet side of the refrigerated condenser on a dry-to-dry machine weekly with a temperature sensor to determine if it is equal to or less than 7.2 °C (45°F). The temperature sensor shall be used according to the manufacturer's instructions and shall be designed to measure a temperature of 7.2 °C (45°F) to an accuracy of ±1.1°C (±2°F). (§63.323(a)(1))

#### Record Keeping:

- 1. Each owner or operator shall keep receipts of perchloroethylene purchases and a log of the following information and maintain such information on site and show it upon request for a period of five (5) years; (§63.324(d))
  - a) The volume of perchloroethylene purchased each month by the dry cleaning facility as recorded from perchloroethylene purchase; if no perchloroethylene is purchased during a given month then the owner or operator would enter zero (0) gallons into the log; (§63.324(d)(1)) Attachment L, or an equivalent record keeping sheet shall be used to record all information required by this rule.
  - b) The calculation and result of the yearly perchloroethylene consumption determined on the first day of each month as specified in §63.323(d); (§63.324(d)(2)) Attachment L, or an equivalent record keeping sheet shall be used to record all information required by this rule.
  - c) The dates when the dry cleaning system components are inspected for perceptible leaks as specified in §63.322(k) or (l), and the name or location of dry cleaning system components where perceptible leaks are detected. (§63.324(d)(3)) Attachment M, or an equivalent record keeping sheet shall be used to record all information required by this rule.
  - d) The dates of repair and records of written or verbal orders for repair parts to demonstrate compliance with §63.322(m) or (n). (§63.324(d)(4))
  - e) The date and temperature sensor monitoring results, as specified in §63.323 if a refrigerated condenser is used to comply with §63.322(a) or (b); and (§63.324(d)(5)) (Attachment N, or an equivalent record keeping sheet shall be used to record all information required by this rule)
- 2. Each owner or operator shall retain onsite a copy of the design specifications and the operating manuals for each dry cleaning system and each emission control device located at the dry cleaning facility. (§63.324(e)).

#### Reporting:

- 1. Each owner or operator shall notify the Administrator or delegated state authority in writing within two hundred seventy (270) calendar days after September 23, 1993 (i.e., June 18, 1994) and provide the following information; (§63.324(a))
  - a) The name and address of the owner or operator; ( $\S63.324(a)(1)$ )
  - b) The address (that is, physical location) of the dry cleaning facility; (§63.324(a)(2))
  - c) A brief description of the type of each dry cleaning machine at the dry cleaning facility; (§63.324(a)(3)
  - d) Documentation as described in §63.323(d) of the yearly perchloroethylene consumption at the dry cleaning facility for the previous year to demonstrate applicability according to §63.320; or an estimation of perchloroethylene consumption for the previous year to estimate applicability with §63.320; (§63.324(a)(4) and
  - e) A description of the type of control device(s) that will be used to achieve compliance with §63.322(a) or (b) and whether the control device(s) is currently in use or will be purchased. (§63.324(a)(5))
  - f) Documentation to demonstrate to the Administrator's satisfaction that each room enclosure used to meet the requirements of §63.322(a)(3)(i) and (ii). (§63.324(a)(6))
- 2. Each owner or operator shall submit to the Administrator or delegated State authority by registered mail on or before the 30<sup>th</sup> day following the compliance dates specified in §63.320(b) or (c) or June 18, 1994, whichever is later, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: (§63.324(b))
  - a) The yearly perchloroethylene solvent consumption limit based upon the yearly solvent consumption calculated according to §63.323(d); (§63.324(b)(1))
  - b) Whether or not they are in compliance with each applicable requirement of §63.322; (§63.324(b)(2)) and
  - c) All information contained in the statement is accurate and true. (§63.324(b)(3))
- 3. Each owner or operator of an area source dry cleaning facility that exceeds the solvent consumption limit reported in §63.324(b) shall submit to the Administrator or a delegated state authority by registered mail on or before one hundred eighty (180) calendar days from the date that the facility determines it has exceeded the amount specified, a notification of compliance status providing the following information and signed by a responsible official who shall certify its accuracy: (§63.324(c))
  - a) The new yearly perchloroethylene solvent consumption limit base upon the yearly solvent consumption calculated according to §63.323(d); (§63.324(c)(1)
  - b) Whether or not they are in compliance with each applicable requirement of §63.322 (these are the new requirements from moving to a major source from a large area source); (§63.324(c)(2) and
  - c) All information contained in the statement is accurate and true. (§63.324(c)(3))

	EU8030 through EU8040 Building 2341 Boilers No. 1 Building 2341 Boilers No. 2						
Emission Unit	Description:	Manufacturer/Model #	2002 EIQ Reference #				
EU8030	A 17.20 mmBtu/hr boiler which combusts liquefied petroleum gas (LPG). Installed in 1966.	Bigelow	EP002T				
EU8040 A 17.20 mmBtu/hr boiler which combusts liquefied petroleum gas (LPG). Installed in 1966.		Bigelow	EP002U				

# Permit Condition (EU8030 through EU8040)-001

10 CSR 10-3.060

Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

#### Emission Limitation:

The permittee shall not emit particulate matter in excess of the emission limit, in pounds per million BTU of heat input from each of the emission units EU8030 and EU8040, as defined below.

$$E = 0.90(O)^{-0.174}$$

where

E = the maximum allowable particulate emission rate in pound per million Btu of heat input; and

Q = the installation heat input in million of Btu per hour.

#### **Equipment and Operation Parameters:**

These emission units shall be limited to burning liquefied petroleum gas (LPG).

#### Monitoring/Record Keeping:

- 1. The permittee shall maintain the installation total heat input and emission limitation calculations.
- 2. The permittee shall maintain potential to emit calculations in terms of pounds of particulate matter per million BTU of heat input for each fuel type burned in each of the emission units EU8030 and EU8040.
- 3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4. Attachments E and F contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

# Reporting:

- 1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) listed above.
- 2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

# Permit Condition (EU8030 through EU8040)-002

10 CSR 10-6.260<sup>1,2</sup>

**Restriction of Emission of Sulfur Compounds** 

#### Emission Limitation:

- 1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period
- 2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(4) &10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks	
	0.03 parts per million (ppm) (80 micrograms per cubic meter (μg/m³))	Annual arithmetic mean	
Sulfur Dioxide (SO <sub>2</sub> )	0.14 ppm (365 μg/m³)	24-hour average not to be exceeded more than once per year	
	0.5 ppm (1300 μg/m³)	3-hour average not to be exceeded more than once per year	
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 μg/m³)	½-hour average not to be exceeded over 2 times per year	
nydrogen sumde (m <sub>2</sub> s)	$0.03 \text{ ppm } (42 \mu\text{g/m}^3)$	½-hour average not to be exceeded over 2 times in any 5 consecutive days	
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 μg/m³	24-hour average not to be exceeded more than once in any 90 consecutive days	
Suntine Acid (112504)	$30 \mu\text{g/m}^3$	1-hour average not to be exceeded more than once in any 2 consecutive days	

#### Equipment and Operation Parameters:

These emission units shall be limited to burning liquefied petroleum gas (LPG).

#### Monitoring/Record Keeping:

Documentation supporting the fuel used is liquefied petroleum gas (LPG).

#### Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<sup>1</sup> 10 CSR 10-6.260(4) of August 30, 1996 version and 10 CSR 10-6.260(3)(B) of May 30, 2004 version is state-only.

<sup>&</sup>lt;sup>2</sup> The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that uses exclusively pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units would not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

EU8050 through EU8060 Building 2351 Boilers No. 3						
	Building 2351 Boilers No. 4					
Emission Unit	. Description	Manufacturer/Model #	2002 EIQ Reference #			
EU8050	A 14.80 mmBtu/hr boiler which combusts fuel oil no. 1 and fuel oil no. 2. Installed in 1972.	Bigelow	EP002V			
EU8060	A 14.80 mmBtu/hr boiler which combusts fuel oil no. 1 and fuel oil no. 2. Installed in 1972.	Bigelow	EP002W			

# Permit Condition (EU8050 through EU8060)-001

10 CSR 10-3.060

Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

#### Emission Limitation:

The permittee shall not emit particulate matter in excess of the emission limit, in pounds per million BTU of heat input from each of the emission units EU8050 and EU8060, as defined below.

$$E = 1.31(O)^{-0.338}$$

#### where

E = the maximum allowable particulate emission rate in pound per million Btu of heat input; and

Q = the installation heat input in million of Btu per hour.

# **Equipment and Operation Parameters:**

The emission unit shall be limited to burning fuel oil no. 1 and fuel oil no. 2.

#### Monitoring/Record Keeping:

- 1. The permittee shall maintain the installation total heat input and emission limitation calculations.
- 2. The permittee shall maintain potential to emit calculations in terms of pounds of particulate matter per million BTU of heat input for each fuel type burned in each of the emission units EU8050 and EU8060.
- 3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4. Attachments E and F contains a log including these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

#### Reporting:

- 1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) listed above.
- 2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

Installation ID Number: 169-0004 Project Number: 169-0004-020F

# Permit Condition (EU8050 through EU8060)-002

10 CSR 10-6.220

**Restriction of Emission of Visible Air Contaminants** 

#### Emission Limitation:

- 1. No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%.
- 2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60%.

#### **Monitoring:**

- 1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in USEPA Test Method 22. Readings are only required when the emission unit is operating, burning fuel oil and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2. The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted:
    - 1. Weekly observations shall be conducted for a minimum of eight consecutive weeks. Should no violation of this regulation be observed during this period then-
    - 2. Observations must be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
    - 3. Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.

#### Record Keeping:

- 1. The permittee shall maintain records of all observation results (see Attachment B), noting:
  - a) Whether any air emissions (except for water vapor) were visible from the emission units,
  - b) All emission units from which visible emissions occurred, and
  - c) Whether the visible emissions were normal for the process.
- 2. The permittee shall maintain records of any equipment malfunctions (see Attachment D).
- 3. The permittee shall maintain records of any USEPA Method 9 opacity test performed (see Attachment C) in accordance with this permit condition.
- 4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 5. All records shall be kept for a period of five years.

#### Reporting:

- 1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

# Permit Condition (EU8050 through EU8060)-003

10 CSR 10-6.260<sup>3</sup>

**Restriction of Emission of Sulfur Compounds** 

#### Emission Limitation:

1. No person shall cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period

2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(4)]

&10 CSR 10-6.010 Ambient Air Quality Standards]

Pollutant	Concentration by Volume	Remarks	
	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m³))	Annual arithmetic mean	
Sulfur Dioxide (SO <sub>2</sub> )	0.14 ppm (365 μg/m³)	24-hour average not to be exceeded more than once per year	
	0.5 ppm (1300 μg/m³)	3-hour average not to be exceeded more than once per year	
Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 μg/m³)	½-hour average not to be exceeded over 2 times per year	
Trydrogen Samue (1125)	$0.03 \text{ ppm } (42 \mu\text{g/m}^3)$	½-hour average not to be exceeded over 2 times in any 5 consecutive days	
Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 μg/m³	24-hour average not to be exceeded more than once in any 90 consecutive days	
Sulluic Acid (H <sub>2</sub> SO <sub>4</sub> )	30 μg/m <sup>3</sup>	1-hour average not to be exceeded more than once in any 2 consecutive days	

#### Equipment and Operation Parameters:

The emission unit shall be limited to burning pipeline grade natural gas, fuel oil no. 1 and fuel oil no. 2.

#### Monitoring/Record Keeping:

- 1. The permittee shall maintain an accurate record of the sulfur content for fuel oil no. 1 and fuel oil no. 2. Fuel purchase receipts, analyzed samples or certifications that verity the fuel type and sulfur content will be acceptable.
- 2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 3. All records shall be maintained for five years.

#### Reporting:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<sup>&</sup>lt;sup>3</sup> 10 CSR 10-6.260(4) is state-only.

U.S. Army MANSCEN and Fort Leonard Wood Installation ID Number: 169-0004

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# IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

#### 10 CSR 10-3.030, Open Burning Restrictions

- 1. The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
- 2. Exception Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
- 3. Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
  - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
  - b) The schedule of burning operations;
  - c) The exact location where open burning will be used to dispose of the trade wastes;
  - d) Reasons why no method other than open burning is feasible; and
  - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
- 4. Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt U.S. Army MANSCEN and Fort Leonard Wood from the provisions of any other law, ordinance or regulation.
- 5. The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

#### 10 CSR 10-3.090, Restriction of Emission of Odors

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

This requirement is not federally enforceable.

# 10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions

- 1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and

- j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2. The permittee shall submit the paragraph (1.) information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (1.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5. Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### 10 CSR 10-6.060, Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

# 10 CSR 10-6.065, Operating Permits

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request.

# 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants 40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

- 1. The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

# 10 CSR 10-6.100, Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

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# 10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information

1. The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.

- 2. The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3. The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

# 10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

## 10 CSR 10-6.150, Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

# 10 CSR 10-6.180, Measurement of Emissions of Air Contaminants

- 1. The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2. The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3. The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

# <u>10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption</u> <u>Requirements</u>

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

#### 10 CSR 10-6.280, Compliance Monitoring Usage

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:

- a) Monitoring methods outlined in 40 CFR Part 64;
- b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
- c) Any other monitoring methods approved by the director.
- 2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - 1. 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - 2. 10 CSR 10-6.040, "Reference Methods";
    - 3. 10 CSR 10-6.070, "New Source Performance Standards";
    - 4. 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

# <u>Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone</u>

- 1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. Federal Only - 40 CFR part 82

# V. General Permit Requirements

#### **Permit Duration**

10 CSR 10-6.065(6)(C)1.B.

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

# General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

#### 1. Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

#### 2. Reporting

- a) The permittee shall submit a report of all required monitoring by:
  - 1. October 1st for monitoring which covers the January through June time period, and
  - 2. April 1st for monitoring which covers the July through December time period.
  - 3. <u>Exception:</u> Monitoring requirements which require reporting more frequently than semi annually, the permittee shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- b) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- c) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
  - 1. Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
  - 2. Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
  - 3. Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
  - 4. These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

# Risk Management Plans Under Section 112(r)

10 CSR 10-6.065(6)(C)1.D.

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1. June 21, 1999;
- 2. Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3. The date on which a regulated substance is first present above a threshold quantity in a process.

# Severability Clause

10 CSR 10-6.065(6)(C)1.F.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **General Requirements**

10 CSR 10-6.065(6)(C)1.G

- 1. The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2. The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3. The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.
- 4. This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5. The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

#### **Incentive Programs Not Requiring Permit Revisions**

10 CSR 10-6.065(6)(C)1.H.

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

# **Compliance Requirements**

10 CSR 10-6.065(6)(C)3.

- 1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3. All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4. The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1<sup>st</sup>, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5<sup>th</sup> Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification,
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation,
  - c) Whether compliance was continuous or intermittent,
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **Permit Shield**

10 CSR 10-6.065(6)(C)6.

- 1. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit; or

- b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2. Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The administrator's authority to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

#### **Emergency Provisions**

10 CSR 10-6.065(6)(C)7.

- 1. An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2. Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

# **Operational Flexibility**

10 CSR 10-6.065(6)(C)8.

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program and the Administrator at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1. Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program and to the Administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are

affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, The permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

#### **Off-Permit Changes**

10 CSR 10-6.065(6)(C)9.

- 1. Except as noted below, The permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; The permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

#### Responsible Official

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by Scott Murrell, Chief, Energy, Environmental, and Natural Resources Division. U.S. Army MANSCEN and Fort Leonard Wood has provided the Missouri Department of Natural Resources with the appropriate supporting documentation designating Ms. Susan S. Halter, Deputy Garrison Commander, as the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

# **Reopening Permit For Cause**

10 CSR 10-6.065(6)(E)6.

In accordance with 10 CSR 10-6.065(6)(E)6.A., this permit may be reopened with cause if:

- 1. The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2. MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3. Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4. The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5. MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

#### **Statement of Basis**

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

# Attachment A

This attachment may be used to help meet the record keeping requirements of Permit Condition PW003 if required.

	Fugitive Emission Observations							
	Visible Emissions Abnormal Emissions							
Date	Time	Emission Source	Normal	Less Than Normal	Greater Than Normal	Cause	Corrective Action	Signature
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								·
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		****	<del></del>					
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# Attachment B

This attachment may be used to help meet the record keeping requirements of Permit Conditions: (EU8050 through EU8060)-002.

	Method 22 Opacity I	Emission Observations			
Date in	Method 22 Test Observer	Visible Emissions (yes/no)	If Visible emissions, was a method 9 done?  (yes/no)		
			The state of the s		
•					
1 30 3,44400					

# Attachment C

This attachment may be used to help meet the record keeping requirements of Permit Conditions: (EU8050 through EU8060)-002.

M. Carlotte and M. Carlotte an	lethod 9 Opacity Emissions Observations
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour Minute		Seconds 30 45		Steam Plume (check if applicable) Attached Detached				
HOUR	Minute	0	15	30	45	Attached	Detached	Commens
	0							
	1							
	2							
	3	<u> </u>						
	4							
	5							
	6							
	7		<u> </u>					
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

	SUMN	IMRAY (O) E ANY B	RAGE OPAC	ITY	
Set Number	1	îme .		Opa	city
SELINGITOE	Start -	End		Sum	Average

Readings ranged fromto% opac	ity.		
Was the emission unit in compliance at the time of evaluation?			
1	YES	NO	Signature of Observer

# Attachment D

This attachment may be used to help meet the record keeping requirements of Permit Conditions: (EU8050 through EU8060)-002.

	Inspection/Maintenance	/Repair/Mattunction Log
Date	Emission Unit/Equipment	Repair/Malfunction Log  Activities Performed
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# Attachment E

This attachment may be used to help meet the record keeping requirements of Permit Condition (EU8030 through EU8040)-001 and (EU8050 through EU8060)-001

Unit Description	Heat Ir	iput (Q)
Building 2351 Boiler No.1	17.20	MMBtu/hr
Building 2351 Boiler No.2	17.20	MMBtu/hr
Building 2351 Boiler No.3	14.80	MMBtu/hr
Building 2351 Boiler No.4	14.80	MMBtu/hr
Heat Input (Q) for Project #169-0004-020F	64.00	MMBtu/hr

Total Installation Heat Input		
Heat Input (Q) for Project #169-0004-020A	261.35	MMBtu/hr
Heat Input (Q) for Project #169-0004-020B	2.50	MMBtu/hr
Heat Input (Q) for Project #169-0004-020C	0.00	MMBtu/hr
Heat Input (Q) for Project #169-0004-020E	16.65	MMBtu/hr
Heat Input (Q) for Project #169-0004-020F	64.00	MMBtu/hr
Heat Input (Q) for Project #169-0004-020G	199.89	MMBtu/hr
Total Installation Heat Input (Q)	544.39	MMBtu/hr
PM Allowable Emission Limitation for "New" Units <sup>1</sup> $E = 1.31(Q)^{-0.338}$	0.16	lb PM/MMBtu
PM Allowable Emission Limitation for "Existing" Units <sup>1</sup> $E = 0.90(Q)^{-0.174}$	0.30	lb PM/MMBtu

<sup>&</sup>lt;sup>1</sup>Compliance calculations for the units subject to 10 CSR 10-5.030 can be found in Attachment F.

#### Attachment F

This attachment may be used to help meet the record keeping requirements of Permit Condition (EU8030 through EU8040)-001 and (EU8050 through EU8060)-001

<u>Unit</u>	Puel	Maximum Hourly Design Rate <sup>1</sup>	Emission Factor <sup>2</sup>	Boiler Heat Capacity (MMBtu/hr)	Potential Emission Rate <sup>3</sup> (lbs/MMBtu)	Emission Limitation (lbs/MMBtu)
EU8030	LPG	0.1880	0.6	17.20	0.01	0.30
EU8040	LPG	0.1880	0.6	17.20	0.01	0.30
EU8050	Fuel Oil No. 1 & 2	0.1057	2.00	14.80	0.01	0.16
EU8060	Fuel Oil No. 1 & 2	0.1057	2.00	14.80	0.01	0.16

Natural Gas: 1050 MMBtu/MMCF

Units: MMCF/hr

Fuel Oil: 140 MMBtu/10<sup>3</sup> gallons

Units: 10<sup>3</sup> gallons/hr

<sup>2</sup>Natural Gas: Emission Factor Source = AP42 Sec 1.4 (7/98)

Units: lb PM/MMCF

Fuel Oil: Emission Factor Source = AP42 Sec. 1.3 (9/78)

Units: lb PM/10<sup>3</sup> gallons

<sup>&</sup>lt;sup>3</sup>Potential PM Emission Rate = Max. Hourly Design Rate (units/hr) \* Emission Factor (lb/units) \* (1/Boiler Heat Capacity [MMBtu/hr])

# Attachment G

This Attachment G is used to verify compliance with the limitations of 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds.

Emission Unit	Emission Unit Desc	iption	SO <sub>2</sub> Emission Factor (Ib/MMBtu) <sup>1</sup>	SO <sub>2</sub> Emissions (lb/MMBtu)	SO <sub>2</sub> Limit (lb/MMBtu)	
EU8030 EU8040	Bldg. 2351 Boiler #1 Bldg. 2351 Boiler #3	LPG	0.0006 AP42 Tbl 1.4-2 (07/98)	0.0006	8.0	
EU8050 EU8060	Bldg. 2351 Boiler #3 Bldg. 2351 Boiler #4	Diesel	0.52 AP42 Tbl 1.3-1 (09/98)	0.52	8.0	
<sup>1</sup> SO <sub>2</sub> emissio	<sup>1</sup> SO <sub>2</sub> emission factor converted 0.6 lb/scf to lb/MMBtu by dividing by 1050 mmBTU/10 <sup>6</sup> scf for LPG.  SO <sub>2</sub> emission factor converted 71 lb/10 <sup>3</sup> sol to lb/MMBtu by dividing by 137 mmBTU/10 <sup>3</sup> sol for Discel Final					

Attachment L

# PERC CONSUMPTION RECORD

This attachment may be used to help meet the record keeping requirements of Permit Condition (EU8010 through 8020)-001.

Month	Quantity Purchased (gal)	12 Month Total From Through	12 Month Total (gal)	Notes
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	111,000			
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		-		

# Attachment M

#### LEAK DETECTION INSPECTION LOG

This attachment may be used to help meet the record keeping requirements of Permit Condition (EU8010 through 8020)-001.

Date	
Machine Number	
Inspector	
Inspection done by (check the appropriate space):	
Sight, smell, and feel	
Monitoring instrument (Type	)

	Inspect the following items for leaks	Signs of	Leaking
1	Hose and pipe connections, fittings, couplings, and valves	YES	NO
2	Door gaskets and seatings	YES	NO
3_	Pumps	YES	NO
4	Solvent tanks and containers	YES	NO
5_	Water separators	YES	NO
6	Muck cookers	YES	NO
7_	Stills	YES	NO
8	Exhaust dampers	YES	NO
9	Diverter valves	YES	NO
10	Filter gaskets and seatings	YES	NO
11	Cartridge filter housings	YES	NO

Attachment N

# REFRIGERATED CONDENSER WEEKLY TEMPERATURE LOG

This attachment may be used to help meet the record keeping requirements of Permit Condition (EU8010 through 8020)-001.

FOR A DRY-TO-DRY MACHINE, A DRYER, OR A RECLAIMER, MEASURE THE TEMPERATURE ON OUTLET SIDE OF REFRIGERATED CONDENSER.

DATE	INSPECTORS INITIALS	MACHINE NO.	TEMPERATURE (°F)	IS TEMPERATURE < 45 °F?
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
		·		YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
				YES / NO
	·			YES / NO
				YES / NO
				YES / NO
				YES / NO

Installation ID Number: 169-0004

# STATEMENT OF BASIS

#### **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1. Part 70 Operating Permit Application, received May 15, 1997
- 2. 2000 Emissions Inventory Questionnaire, received April 2, 2001, revised May 25, 2001;
- 3. U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4. Air Pollution Control Program Construction Permit #072003-022;
- 5. Air Pollution Control Program Construction Permit #062003-005;
- 6. Air Pollution Control Program Construction Permit #082000-006;
- 7. Air Pollution Control Program Construction Permit #082000-004;
- 8. Air Pollution Control Program Construction Permit #1099-001C:
- 9. Air Pollution Control Program Construction Permit #1099-001B;
- 10. Air Pollution Control Program Construction Permit #1099-001A;
- 11. Air Pollution Control Program Construction Permit #1099-001;
- 12. Air Pollution Control Program Construction Permit #0999-015;
- 13. Air Pollution Control Program Construction Permit #0699-002;
- 14. Air Pollution Control Program Construction Permit #0998-032;
- 15. Air Pollution Control Program Construction Permit #0897-013;
- 16. Air Pollution Control Program Construction Permit #0697-003;
- 17. Air Pollution Control Program Construction Permit #0895-030;
- 17. An i onation control rogram construction terms wood 500,
- 18. Air Pollution Control Program Construction Permit #0695-010A;
- 19. Air Pollution Control Program Construction Permit #0695-010;
- 20. Air Pollution Control Program Construction Permit #0495-013A;
- 21. Air Pollution Control Program Construction Permit #0495-013;
- 22. Air Pollution Control Program Construction Permit #0294-007A;
- 23. Air Pollution Control Program Construction Permit #0294-007;
- 24. Air Pollution Control Program Construction Permit #0891-003;
- 25. Air Pollution Control Program Construction Permit #0790-007;
- 26. Air Pollution Control Program Construction Permit #0590-004;
- 27. Air Pollution Control Program Construction Permit #0983-019;
- 28. Air Pollution Control Program Construction Permit #0979-030;
- 29. Air Pollution Control Program Construction Permit #0879-(010-011);
- 30. Air Pollution Control Program Construction Permit #0179-(006-016).

# Applicable Requirements Included in the Operating Permit but Not in the Application

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

1. 10 CSR 10-6.180, Measurement of Emissions of Air Contaminants,

This rule has been included in the operating permit in order to provide citing for the allowance of requests for emissions data results. On past forms issued by the Air Pollution Control Program, including the application for this permit, it was automatically marked as an administrative rule not required to be listed as an applicable

requirement. It is no longer judged to be solely administrative and is, therefore, included in the operating permit as a core permit requirement.

- 2. 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
  10 CSR 10-3.080, Restriction of Emission of Visible Air Contaminants, has been rescinded and removed from the SIP. It has been replaced by 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, which is an applicable requirement in the operating permit.
- 3. 10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds

  This rule has essentially replaced 10 CSR 10-3.100, Restriction of Emission of Sulfur Compounds, and 10 CSR 10-3.150, Restriction of Emission of Sulfur Compounds From Indirect Heating Sources. It has been determined to be applicable to the installation and therefore has been included in the operating permit.

# Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.240, Asbestos Abatement Projects – Registration, Notification, and Performance Requirements. This rule has been determined not to apply to the installation and omitted from the operating permit.

#### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

No construction permits have been issued for the dry cleaning operations.

#### **NSPS** Applicability

40 CFR Part 60, Subpart Dc does not apply to any of the boilers covered under this permit because the units were installed prior to the applicability date of the subpart.

#### **MACT Applicability**

This installation is subject to 40 CFR Part 63, Subpart M, National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities. Information collected at the installation shows that two (2) dry-to-dry machines were installed before December 9, 1991. The data suggests the units were installed in 1990. The installation uses approximately 182 gallons of perchloroethylene a year. The installation is classified as an existing large area source in the MACT.

#### **NESHAP Applicability**

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition parts of the subpart which makes the subpart applicable to all sources. It is included as a core permit requirement.

#### **Other Regulatory Determinations**

- 1. The units listed in the "Emission Units Without Limitations" section in the front of this permit either have no applicable regulations associated with them or are consider insignificant activities by the operating permit application.
- 2. 10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premise of Origin, is applicable to the installation. Due to the size and unique geographical aspects of the installation it is highly unlikely that the installation will ever exceeded the emission limitations of 10 CSR 10-6.170, therefore no monitoring, record keeping and reporting is necessary unless required by the Director.

- 3. 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants, is applicable to all boiler units and is included in the Title V permit for those units that burn fuel oil and that are not specifically exempted from the operating permit requirements by 10 CSR 10-6.065. For those boilers not exempt from 10 CSR 10-6.065 but that burn natural gas or LPG, 10 CSR 10-6.220 is applicable. However, based on a decision/agreement between EPA Region VII, Air Pollution Control Program Enforcement and Air Pollution Control Program Permitting, 10 CSR 10-6.220 is not being included in Title V permits for natural gas or LPG combustion units because by the nature of the fuel, no opacity exceedances would ever be expected under normal operating conditions.
- 4. 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*. Attachment G represents compliance calculations necessary to verify compliance with this regulation.
- 5. 10 CSR 10-6.400, Restriction of Emission of Particulate Matter, was not included as an applicable regulation for the boilers since indirect heating is specifically exempted by the rule.
- 6. 10 CSR 10-3.060, Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating. Attachments E and F represent emission limit and compliance calculations necessary to verify compliance with this regulation.

### Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one (1) or more of the following reasons:

- 1. The specific pollutant regulated by that rule is not emitted by the installation;
- 2. The installation is not in the source category regulated by that rule;
- 3. The installation is not in the county or specific area that is regulated under the authority of that rule;
- 4. The installation does not contain the type of emission unit which is regulated by that rule;
- 5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one (1) or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

Michael Van Cleave

Environmental Engineer